

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, on behalf herself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 03-CV-12628

JOHN G. ESPOSITO, JR., D.D.S., on  
behalf himself and all others similarly  
situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10013

JOSEPH L. KING, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10038

**[Additional Captions Follow on Next Page]**

Michael E. CRIDEN, on behalf himself  
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10046

ISRAEL SHURKIN and SHARON  
SHURKIN on behalf themselves and all  
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10055

JAMES J. NIZZO and VIRGINIA C.  
NIZZO, as JOINT TENANTS and CARLO  
CILIBERTI, on behalf of themselves and  
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10065

**[Additional Captions Follow on Next Page]**

BARRY BROOKS, on behalf himself and  
all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10077

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

ANASTASIOS PERLEGIS, on behalf  
himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10078

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

MARTIN WEBER, on behalf of himself  
and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10090

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

**[Additional Captions Follow on Next Page]**

BRUCE HAIMS, on behalf himself and all  
others similarly situated,

Plaintiff,

Civil Action No. 04-10144

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

MODEL PARTNERS LIMITED, on behalf  
themselves and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10155

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

JUNE E. PATENAUDE, on behalf of  
herself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10179

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

**[Additional Captions Follow on Next Page]**

NANCY L. PINCKNEY and GERTRUDE  
PINCKNEY, on behalf themselves and all  
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10189

W. KENNETH JOHNSON, on behalf  
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10190

GREGORY KRUSZKA, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,  
Defendants.

Civil Action No. 04-CV-10202

**DECLARATION OF JEFFREY C. BLOCK IN SUPPORT OF GEORGE  
ELIOPOULOS, DALE SELF AND MARK MENTZ'S MOTION FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,  
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

I, Jeffrey C. Block, Esq. under the penalty of perjury, declare and say:

1. I am a partner with the law firm of Berman DeValerio Pease Tabacco Burt & Pucillo (“Berman DeValerio”), One Liberty Square, Boston, MA 02109, counsel for proposed Lead Plaintiffs, George Eliopoulos, Dale Self and Mark Mentz (“Proposed Lead Plaintiffs”). I submit this Declaration in support of the Proposed Lead Plaintiffs’ motion for appointment as Lead Plaintiffs and to approve its selection of Lead Counsel.

2. On December 30, 2003, pursuant to Section 78u-4(a)(3)(A)(i) of the Private Securities Litigation Reform Act (“PSLRA”), the law firm of Cauley Geller Bowman & Rudman, LLP caused a press release to be published over *PR Newswire*, a national business-oriented wire service, notifying members of the proposed class of their right to move to serve as lead plaintiff by no later than sixty (60) days from the date of publication of the notice. The press releases were reprinted verbatim by *Dow Jones*, *Lexis/Nexis*, *Yahoo*, *Westlaw* and *Bloomberg*. Attached hereto as Exhibit A is a true and accurate copy of those notices.

3. *PR Newswire* is an electronic distributor of corporate, association and institutional news releases to the media and the financial community. *PR Newswire* distributed the Notices to more than 2,000 different news outlets, including *Dow Jones News Retrieval*, *Associated Press* and *Reuters*.

4. George Eliopoulos, Dale Self and Mark Mentz have completed certification forms in accordance with Section 78u-4 (a)(3)(B)(iii)(I)(aa) of the PSLRA. Attached hereto as Exhibit B are true and accurate copies of those certifications.

5. The “mean” or average closing price for Biopure Corporation’s common stock during the period December 25, 2003 through March 1, 2004 was \$2.0295 per share. Attached

as Exhibit C is a true and accurate copy of the Biopure's common stock price chart for the period December 25, 2003 through March 1, 2004.

6. During the Class Period, George Eliopoulos suffered losses of \$31,008 on his investment in Biopure. During the Class Period, Dale Self suffered losses of \$15,498 on his investment in Biopure. During the Class Period, Mark Mentz suffered losses of \$13,707 on his investment in Biopure. Attached as Exhibit D are a series of tables calculating the losses for Messrs. Eliopoulos, Self and Mentz in Biopure.

7. A true and accurate copy of the Berman DeValerio Pease Tabacco Burt & Pucillo firm resume is annexed hereto as Exhibit E.

8. A true and accurate copy of the Cohen, Milstein, Hausfeld & Toll, P.L.L.C. firm resume is annexed hereto as Exhibit F.

Signed under the penalties of perjury this 1<sup>st</sup> day of March, 2004.

/s/ Jeffrey C. Block